

**THE NOLAN LAW FIRM**  
A GENERAL LAW PRACTICE

WILLIAM PAUL NOLAN, ESQ.  
E-MAIL  
WPN@ATTORNEYSNEWYORK.COM

TELEPHONE  
(212) 308-3456  
TELECOPIER  
(212) 879-6806

444 EAST 75TH STREET  
NEW YORK, NEW YORK 10021  
15TH FLOOR  
(ADDRESS FOR SERVICE)

590 MADISON AVENUE  
NEW YORK, NEW YORK 10022  
21ST FLOOR

April 4, 2008

Hon. Gerard E. Lynch  
United States District Judge  
Southern District of New York  
500 Pearl Street  
Chambers Room 910  
New York, New York 10007

MEMO ENDORSED

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 4/7/08
---

Re: Carrone v. Transamerica Capital, Inc., 07 CIV. 8433 GEL

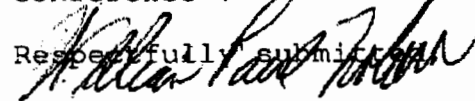
Hon. United States District Judge Lynch:

This is Plaintiff's first request for an adjournment or extension of time. Upon consent of Defendant's counsel and pursuant to the Court's "Individual Practices in Civil Cases", paragraph 1E, the parties seek the Court's permission to adjourn the completion of fact discovery as set forth in the December 17, 2007 Civil Case Management Plan from June 30, 2008 until September 30, 2008 and the next case Management Conference from August 1, 2008 until November 3, 2008 or a similar date. \*

October 3, 2008, at 10:30 a.m.

The reason for the parties' request is Plaintiff's husband's fracture of both hips, which has made Plaintiff, the sole bread winner in the family, responsible for the 24 hour care of her husband, who had been a stay at home dad, and who will continue to be confined to a wheel chair for the next 4-6 weeks before beginning rehabilitation, as well as, responsible for her 2 year old twins and her employment duties.

With the Court's permission, the parties will agree among themselves as to the scheduling of the various discovery items but request that the Court schedule a new "Next Case Management Conference".

Respectfully submitted,  
  
William Paul Nolan  
cc: E. Johan Lubbe, Esq.

\* SO ORDERED

  
GERARD E. LYNCH, U.S.D.J.  
4/6/08